CTIA
Building The Wireless Future™
Cellular Telecommunications & Internet Association

January 9, 2003

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
12th Street Lobby, TW-A325
Washington, DC 20554

***Re*: *Ex Parte* Presentation**
IB Docket No. 01-185; ET Docket No. 95-18; ET Docket No. 00-258

Dear Ms. Dortch:

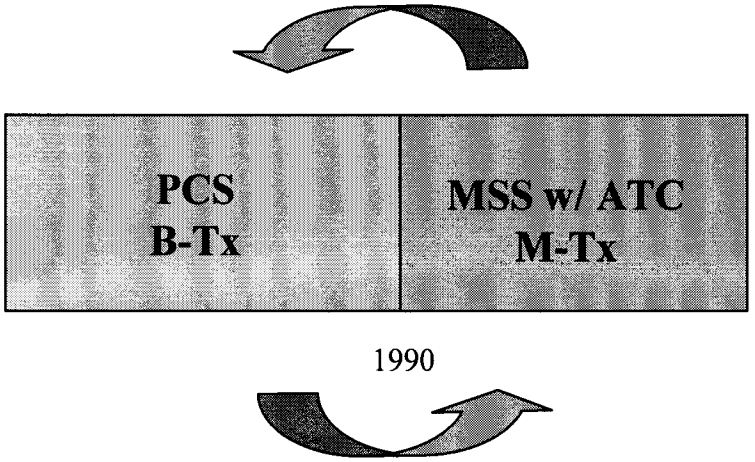
On January 8, 2003, Diane Cornell, Vice President for Regulatory Policy, the Cellular Telecommunications & Internet Association, Don Brittingham, Director for Spectrum Policy, Verizon Wireless, Cecily Cohen, Director for Government & Industry Affairs, Nokia, Inc., and Steve Sharkey, Director for Spectrum and Standards Strategy, Motorola, met with Barry Ohlson, Legal Advisor to Commissioner Adelstein. The parties discussed issues related to Mobile Satellite Services spectrum in the 2 GHz band, including the possible use of the band for an ancillary terrestrial component ("ATC") and the potential reallocation of MSS spectrum for other uses. CTIA reiterated its belief that the 2 GHz MSS spectrum should be reallocated to other uses if demand for MSS services will not require use of the entire band.

The parties emphasized that, as the Commission considers the issues that have been raised in the above captioned proceedings, it should consider the impact on existing services. For example, the use of the 1990–2025 MHz MSS band for ATC would introduce the potential for substantial interference to and from Personal Communications Services ("PCS") operating in adjacent bands. (See attached presentation). Specifically, mobiles operating in the MSS band could cause potentially harmful interference to PCS mobiles and PCS base stations could cause potentially harmful interference to MSS terrestrial base stations operating in the ATC mode.

The Commission can address these potential interference issues by ensuring that there is an adequate guardband to separate the PCS and MSS bands. The Commission should take this requirement into account as it considers any potential reallocation of MSS spectrum in the 1990-2025 and 2165-2200 MHz bands.

MSS / PCS Interference

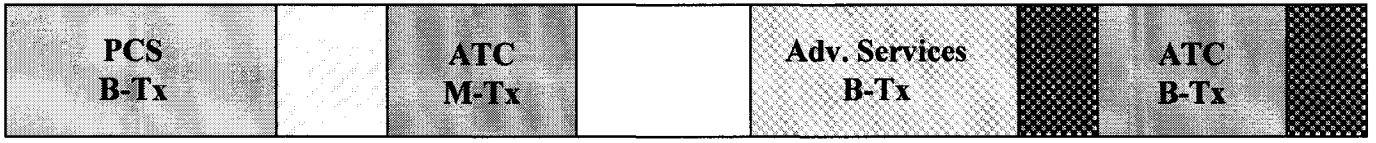
- MSS (w/ ATC) operations at 1990 MHz will result in interference to/from PCS.



- MSS mobile transmitters will interfere into PCS mobile receivers.
- PCS base station transmitters will interfere into MSS terrestrial base station receivers.

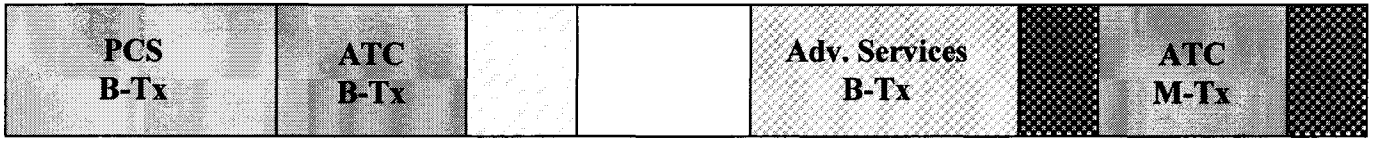
Possible Solutions to MSS/PCS Interference.

Move MSS Up in Band



- Provide sufficient guard band between PCS and MSS at 1990 MHz.
- Guard band not required above 2155 MHz, since both bands are mobile Rx.

Reverse MSS Band Plan

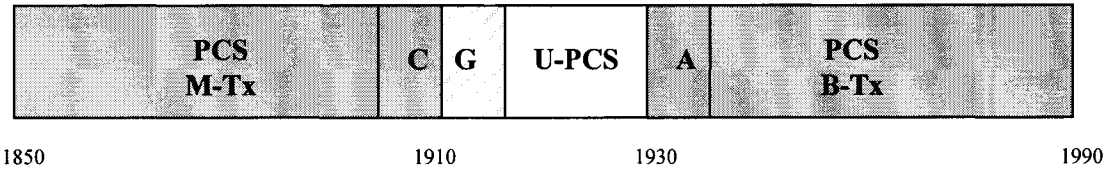


- Interference to PCS at 1990 MHz is resolved.
- **However, MSS mobiles could interfere w/ Advanced Services mobiles at 2155 MHz depending on available guard band.**

Reallocation of U-PCS Band

1910-1930 MHz

- **Similar interference potential between new PCS allocation above 1910 MHz and current PCS operations at 1930 MHz.**



- There must be sufficient guard bands between PCS transmit and receive bands to prevent G block mobile transmitters from interfering into A block mobile receivers.
- Question is not just about whether new mobiles can be designed to accommodate greater interference levels, but how **existing** PCS handsets (and customers) will be affected.

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter is being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

Diane J. Cornell

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cc: Barry Ohlson

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